

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JONATHAN MANNION,

Plaintiff,

v.

UNFINISHED LEGACY LLC, and  
BREMA BREMA,

Defendants.

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Civil Action No. 1:24-CV-07702 (ER)

~~PROPOSED~~ DEFAULT JUDGMENT

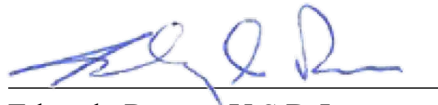
Plaintiff, having commenced the action by the filing of a Summons and Complaint on October 16, 2024, and true copies of the Summons and Complaint having been served upon the Defendant UNFINISHED LEGACY LLC and Defendant BREMA BREMA, individually (collectively, “Defendants”), and proof of service having been filed with the Court on January 24, 2025, and all Defendants having failed to plead or otherwise defend in this action, and said default having been duly noted;

NOW, on motion of the Plaintiff, JONATHAN MANNION, by and through his attorneys, it is hereby ORDERED and ADJUDGED that a Default Judgment be entered against the Defendants, jointly and severally, in the amount of \$156,135.74 ({ \$150,000 } + { \$6,135.74 } in attorneys’ fees and costs), itemized as follows:

- (a) Statutory Damages pursuant to 17 U.S.C. § 504 in the amount of \$150,000;
- (b) Attorneys’ Fees pursuant to 17 U.S.C. § 505 in the amount of \$5,508.74;
- (c) Costs pursuant to 17 U.S.C. § 505 and Fed. R. Civ. P. 4 in the amount of \$627;
- (d) Post-judgment interest under 28 U.S.C. § 1961 as of the date judgment is entered;

- (e) Permanent Injunction enjoining the Defendants, their agents, servants, employees, officers, attorneys and all those persons in active concert or participation with each and any of them from directly or indirectly infringing the Copyrights of Plaintiff in any manner, and from using or publishing the Lauryn Hill Image, or selling or promoting any goods, garments, and/or other items bearing the Lauryn Hill Image.; and
- (f) Impoundment and forfeiture of all apparel featuring the Lauryn Hill Image, as well as any hard drives containing the Lauryn Hill Image or any other of Plaintiff's copyrighted works in the possession of the Defendants, including hard drives containing the Lauryn Hill Image or any other of Plaintiff's copyrighted works in the possession of third parties (such as graphic designers or printers) to whom Defendants have given that protected material for use or copying.

Dated: April 30, 2025  
New York, New York

  
Edgardo Ramos, U.S.D.J.